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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

THOMAS W. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, MEMPHIS

LaToya Coleman

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

UnitedHealthGroup Inc.

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, LaToya M. Coleman
(name of plaintiff)

is a citizen of the United States and resides at 875 Federal Ridge Hwy 208
(street address)

Calicoonville
(city)

USA
(country)

TN
(state)

38017
(zip code)

9013419810
(telephone number)

3. Defendant United Health Group & William Bosarge, Walter Harrison
(defendant's name)
lives at, or its business is located at 3175 Lenox Park Blvd - Memphis
(street address)

Office address. Corporate office is in minn.
William Bosarge & Walter Harrison is located in Brentwood, TN

4. Plaintiff sought employment from the defendant or was employed by the defendant at

3175 Lenox Park Blvd Suite 400

(street address)

Memphis

USA

TN

38115

(city)

(country)

(state)

(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about Jan - May 2010 - 2011

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about N/A

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about SEP 2010

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 27 10 2011. (Attach a copy of the notice to this complaint.)

(day) (month) (year)

9. Because of plaintiff's (1) race, (2) color, (3) sex, (4) religion, (5) national origin, defendant

(a) failed to employ plaintiff.

(b) terminated plaintiff's employment.

(c) failed to promote plaintiff.

(d) "Called me a "Coon" more than once in writing. Emails told me I would not be promoted because I was young & black.

Written on my mail at work reported everything
intensely with no success also I have attachments
to prove this. Also I filed two charges with EEOC
they retaliated against me by forcing my doctors
name on an application form & running on
me. I have Emails to Prove it.

10. The circumstances under which defendant discriminated against plaintiff were as follows: in 2010 WALTER HARRISON DISCRIMINATED AGAINST ME BY SAYING HE IS A "RED NECK" & AN A SPUNKY "COON" BECAUSE HE WANTED A JOB PROMOTION. HE THEN STATED IF I WORK WITH HIM ONE ON ONE, I COULD RECEIVE A PROMOTION. HE ATTEMPTED TO GET ME INTO A HOTEL ROOM. HE MADE SEVERAL ADVANCEMENTS TOWARDS ME. HE TOLD HIS ACTS INTERNALLY ALSO, HE TOLD HE LEFT THE COMPANY. HIS MANAGER BECAME MY MANAGER & HE WORKED WITH ME FOR FILLING MY POSITION. CHARGE AGAINST WALTER. SO THE TERMINATION WAS WHILE I WORK ON AN INTERIMATE FROM HIS TO STRESS HIS RETALIATION. (Evidence shows it)

11. The acts set forth in paragraph 9 of this complaint

(a) are still being committed by defendant.

(b) are no longer being committed by defendant.

(c) may still be being committed by defendant. Because things harder for me to get a job cause they are advertising saying bad things about me,

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

(a) Defendant be directed to employ plaintiff, or

(b) Defendant be directed to re-employ plaintiff, or

(c) Defendant be directed to promote plaintiff, or;

(d) Defendant be directed to pay my back time wage cause I unfairly lost my job & now it's hard to find one.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes () No ()

Latoya Colerica
SIGNATURE OF PLAINTIFF